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April 21, 2022

VIA ELECTRONIC CASE FILING (ECF)

Hon. Marcia M. Henry, U.S.M.J. United States District Court for the Eastern District of New York Chambers Room 1230 225 Cadman Plaza East Brooklyn, New York 11201

Re: Lane v. American Airlines, Inc.,

No. 1:18-CV-06110-MKB-MMH

Dear Judge Henry:

Pursuant to the Court's January 13, 2022 Order, please accept this as the parties' joint status letter and report regarding the close of discovery.

As Your Honor knows, the current discovery end date in this case is today, April 21, 2022. The parties are happy to report that they have substantially completed fact and expert discovery by the Court's deadline. There are a few outstanding matters, however, of which the parties wish to keep the Court apprised.

First, due to some scheduling and technical issues on Plaintiffs' part, Aubrey Lane's interview with Defendant's psychiatric expert, Dr. Gregory Saathoff, was postponed until April 11, 2022. Given the delay, the parties have mutually agreed that Dr. Saathoff will receive a minor extension and that his expert report will be served on Plaintiffs on May 2, 2022 instead of April 21, 2022. The parties hope the Court concurs with this approach.

Second, after a much protracted battle with ADR Wellness (one of Aubrey Lane's medical providers, as referenced in the parties' January 6, 2022 joint letter to the Court (Dkt. No. 69)), ADR Wellness finally produced its raw testing data to the parties last week on April 12, 2022. The parties' respective psychologic experts (Dr. Sheri Vanino and Dr. Nina Rodd) are in the process of reviewing that data now. The parties respectfully request the right to supplement their expert reports should Drs. Vanino and/or Rodd determine such supplementation is necessary.

Finally, Defendant American Airlines, Inc. advises that it has repeatedly requested Aubrey Lane's journals and writings, which have been mentioned by Ms. Lane during interviews, depositions, and in her medical records. Plaintiffs have confirmed they are searching for these materials and will produce the same, although such production is outstanding as of the date of this filing.

On a final note, the parties inform the Court that they have engaged in settlement discussions in this matter and have scheduled a mediation to take place in New York City on June 2, 2022 with third-party mediator, Abigail Pessen.

The parties thank the Court in advance for its consideration and courtesies.

Respectfully submitted,

/s/ Daniel Z. Rivlin
Daniel Z. Rivlin

cc: All counsel of record (via ECF)